

1 Arjun Vasan  
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6 Plaintiff in Pro Per  
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9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 **Arjun Vasan,**  
12 Plaintiff,  
13  
14 vs.  
15 **Checkmate.com, Inc.,**  
16 (dba “Checkmate”),  
17 Defendant.

Case No.: 2:25-cv-00765-MEMF-JPR  
Hon. Maame Ewusi-Mensah Frimpong

**DECLARATION OF ARJUN VASAN  
REGARDING DELAYED DISCHARGE  
FROM INPATIENT MEDICAL CARE**

Hearing Date: September 18, 2025  
Hearing Time: 10am  
Complaint Filed: January 28, 2025

21 I, Arjun Vasan, declare as follows:  
22

- 23 1. I am the Plaintiff in this action, appearing pro se.  
24 2. On July 10, 2025, I was unexpectedly hospitalized due to an acute medical condition. I  
25 promptly informed opposing counsel of my circumstances, and the parties stipulated to a  
26 nine-day extension for my response.  
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28

- 1       3. Unfortunately, my hospitalization and recovery extended longer than anticipated; I was
- 2                  discharged only on August 4, 2025, and regained full access to my records and computer
- 3                  on that date.
- 4        4. While under treatment, I worked diligently and in good faith—albeit on a limited
- 5                  schedule—to prepare and file this motion to dismiss. Now fully recovered, I am
- 6                  submitting this motion at the earliest possible time following my discharge, in order to
- 7                  comply with the extended deadline graciously stipulated to by opposing counsel, for
- 8                  which I am sincerely appreciative.
- 9        5. Never missing a deadline—despite handling two federal cases simultaneously—has
- 10                 always been and remains a point of pride for me. In light of these circumstances, I
- 11                 respectfully request leave to file any necessary corrections or supplemental materials by
- 12                 11:59 p.m. on August 8, 2025, and stipulate to an equivalent two-day extension for
- 13                 Defendant to respond to any amendment or supplement, so that Defendant will suffer no
- 14                 prejudice as a result of this request.
- 15        6. No party will be prejudiced by this request, as I do not anticipate introducing any new
- 16                 evidence not on the record in this or the related Southern District of New York case.
- 17        7. The primary arguments raised in this motion were previously briefed in connection with
- 18                 Checkmate's SDNY complaint, which forms the basis of their counterclaims here. The
- 19                 present motion updates and adapts those arguments in light of this Court's prior order, the
- 20                 law of the case, and the controlling authority of the Ninth Circuit.
- 21        8. Should the Court require further substantiation, I am prepared to provide a medical
- 22                 certification of my hospitalization from July 10, 2025, to my discharge on August 4 as
- 23                 part of any supplemental or amended filing submitted on or before August 8, 2025.
- 24        9. I will file my [Proposed] Order and Request for Judicial Notice by the same date.

26  
27        *I Declare under Penalty of Perjury under the laws of the United States and the State of*  
28        *California that the foregoing is True and Correct.*

Respectfully Submitted,

**Executed on:** August 06, 2025

In Cerritos, Ca

/s/ *Arjun Vasan*

By:

**Arjun Vasan**  
Plaintiff In Pro Per